

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

KINSALE INSURANCE COMPANY, a foreign insurer,

No. 2:22-cv-664-RSL

Plaintiffs,

v.

**JOINT MOTION AND ORDER  
FOR EXTENSION OF TIME  
FOR EAGLE COUNTY  
CONSTRUCTION TO ANSWER  
COMPLAINT**

EAGLE COUNTRY CONSTRUCTION, INC., a  
Washington Corporation; MICHAEL J. HANSEN and  
ROCHELLE HANSEN, individually and the marital  
community comprised thereof; INNOVATIVE  
INVESTMENTS, INC., a Washington Corporation;  
COLTON and MORGAN PATTERSON, a married  
couple; DUSTIN KRENZ and RACHEL STOKES, an  
unmarried couple; WILLIAM and KIMBERLY UNRAU,  
a married couple; and GRETA and ANTHONY  
CHEHREHGOSHA, a married couple,

Defendants.

Plaintiff Kinsale Ins. Co. (hereinafter “Kinsale”) and Defendants Eagle County Construction Inc., Michael J. Hansen, Rochelle Hansen and Innovative Investments, Inc. (collectively “Moving Defendants”) submit the following Joint Motion for Extension of Time for Moving Defendants to Answer or otherwise respond to Kinsale’s Complaint.

The above-referenced parties specifically request that the Court extend the time for Moving Defendants to file their Answer or other response to Kinsale’s Complaint to July 26, 2022.

1 **I. BRIEF STATEMENT OF FACTS**

2 The current deadline for Moving Defendants to file their Answer or respond is on July 12,  
3 2022, just one business day from the time this Motion was filed. Moving Defendants have only  
4 retained counsel in the last couple of days. Accordingly, the above-referenced parties agree that  
5 the deadline for Moving Defendants to file their Answer or other response to Kinsale's Complaint  
6 should be extended to July 26, 2022. Those parties further agree that any responsive pleadings to  
7 Moving Defendants' Answers, if any, will be computed in accordance with the Federal Rules from  
8 the actual date on which Moving Defendants' Answers are filed. Finally, the above parties agree  
9 that this Joint Motion should not affect any other case deadlines.

10 **II. MEMORANDUM OF LAW**

11 Federal Rule of Civil Procedure 6(b)(1)(A) states, in pertinent part, as follows:

12 When an act may or must be done within a specified time, the court may, for good  
13 cause, extend the time: ... (A) with or without motion or if the court acts, or if a  
14 request is made, before the original time or its extension expires ...

15 Fed. R. Civ. P. 6(b)(1)(A).

16 The Court has the discretion and authority to grant an extension of time for the filing of  
17 pleadings for good cause. *See PLU Investments, LLC v. Intraspect Group Inc.*, 2011 U.S. Dist.  
18 LEXIS 42020, 2011 WL 1376192 (W.D. Wash. Apr. 12, 2011) (citing *In re Veritas Software Corp.*  
19 *Sec. Litig.*, 496 F.3d 962, 974 (9th Cir. 2007)). A motion for extension of time filed before a  
20 deadline has passed should "normally ... be granted in the absence of bad faith on the part of the  
21 party seeking relief or prejudice to the adverse party." *Id.* (citing *Ahanchian v. Xenon Pictures,*  
22 *Inc.*, 624 F.3d 1253, 1259 (9th Cir. 2010)).

23 Moving Defendants have requested that Kinsale provide additional time for them to  
24 prepare their Answers or otherwise respond to the Complaint. Moving Defendants have advised  
25 that they only recently retained counsel, and that their attorneys need additional time to review the  
26 case file and confer with their client. Kinsale agrees to the requested extension. As a result, there  
27 is good cause for this Court to grant the extension and this joint request in good faith.  
28

1 Accordingly, the above parties request that the Court grant this Joint Motion for Extension  
2 of Time and allow Moving Defendants until July 26, 2022, to file an Answer to Kinsale's  
3 Complaint, and to further allow all responsive pleadings to be filed in accordance with the Federal  
4 Rules. No other case scheduling dates shall be affected by this Joint Motion.

5  
6 DATED this 11<sup>th</sup> day of July, 2022.

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8 By: s/Richard Dykstra  
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10 By: s/Alexander E. Ackel  
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**ORDER GRANTING JOINT MOTION**

**FOR EXTENSION OF TIME FOR ANSWER TO COMPLAINT**

The Court, having considered the Joint Motion for Extension of Time for Answer to Complaint, hereby ORDERS as follows:


1. The Joint Motion for Extension of Time for Answer or otherwise respond to the Complaint is hereby GRANTED.

2. The deadline for Defendants Eagle County Construction Inc., Michael J. Hansen, Rochelle Hansen and Innovative Investments, Inc. (collectively "Moving Defendants") to file their Answers or other response to Plaintiff Kinsale Insurance Company's Complaint is extended to July 26, 2022.

3. The deadline for any responsive pleadings to Moving Defendants' Answers will be computed in accordance with the Federal Rules from the actual date on which Moving Defendants' Answers are filed.

4. This Order does not affect any other deadlines in this case.

Dated this 13th day of July, 2022.



The Honorable Robert S. Lasnik